

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE: : Case No.: 15-15969  
Elaine Jones :  
: :  
Debtor : Chapter 13

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RESPONSE OF ELAINE JONES TO THE NOVEMBER 8, 2018 CERTIFICATE OF  
DEFAULT

1. Denied.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.  
“5.” Denied.
6. Denied. Subsequent to the Stipulation, on or about May 22, 2017 Chase offered the Debtor a Trial Payment Plan stating three monthly payments beginning on July 1, 2017 through September 1, 2017 in the sum of \$572.36 per month (provided to Movant by the undersigned counsel). The Debtor paid the trial plan payments and has continued to make the trial plan payments; but a permanent modification, signed by both parties, was never entered into.
7. Admitted.
8. Admitted.
9. Denied.

/s/Brad J. Sadek, Esquire

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Dated: November 9, 2018